

# **Exhibit R**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A  
CENTURION PROFESSIONALS;  
MANAGEMENT & TRAINING CORPORATION  
JESSE WILLIAMS, INDIVIDUALLY;  
AND JOHN DOES 1-9

DEFENDANTS

---

ZOOM DEPOSITION OF JERRY WILLIAMS

---

Taken at the Instance of the Plaintiff  
With All Parties Appearing by Zoom Videoconferencing  
On September 21, 2020  
At 11:05 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR  
CSR NO. 1144

1 repetitive, but sometimes I do that. So let me  
2 just ask you: As best you can, tell me what you  
3 told warden Williams about what you had been  
4 told by Representative Kinkade.

5 A. I had been contacted by Representative  
6 Kinkade and advised that they were having staff  
7 shortages and inmates were not being able to be  
8 seen in the clinic as required. I asked him to  
9 address that issue, along with making sure that  
10 he covers our policy as it relates to  
11 confidentiality and use of the chain of command.

12 Q. All right. So did you feel like  
13 whoever had told -- a nurse as you believe --  
14 did you feel like the nurse who had told  
15 Representative Kinkade about this had done  
16 something wrong or something in violation of  
17 your policies?

18 A. I felt like some awareness need to have  
19 been brought to her about the chain of command  
20 and the issues we have at the facility.

21 Q. Did you tell him she needed to be  
22 fired?

23 A. No. No. And I don't have that  
24 authority to fire, you know, the nurse or the  
25 doctor, especially like if they're contract

1 employees. That falls on the contractor that  
2 the agency contracted with, so I don't have that  
3 authority.

4 Q. All right.

5 A. Nor did I make the recommendation.

6 Q. Did you tell the warden that whoever  
7 had talked to the representative should have her  
8 security clearance revoked? She shouldn't be  
9 allowed back on the premises?

10 A. No.

11 Q. Y'all didn't have any discussion like  
12 that?

13 A. No.

14 Q. Am I correct?

15 A. I advised the warden to have a meeting  
16 with the nurse -- because that's what I assumed  
17 then. And Representative Kinkade wanted to meet  
18 with him as well. He said he tried to set up a  
19 meeting but was unable to do so.

20 Q. The warden said he tried to set up a  
21 meeting with whom?

22 A. I think Representative Kinkade, along  
23 with the nurse.

24 Q. To the best of your knowledge, you told  
25 him it was a nurse you were talking about as

1           You testified earlier that April Meggs  
2           called you. Is that correct?

3           A.    Correct. She and I talked. April and  
4           I talked ongoing in particular with appointments  
5           as they relate, you know, to offenders missing  
6           appointments.

7           Q.    Okay. And did she ever call you about  
8           Dr. Woods?

9           A.    No, she didn't call me about Dr. Woods.  
10          I think we had a conversation, and I told her  
11          that the warden had some concerns.

12          Q.    Okay. Did she ever ask you about  
13          trying to reinstate Dr. Woods' security  
14          clearance?

15          A.    No, sir. Well, let me go back. I  
16          don't recall Dr. Woods. I want that for the  
17          record. It was an individual from medical. I  
18          can't recall -- I can't recall Dr. Woods. I'm  
19          not saying who it was. I don't recall who it  
20          was.

21          Q.    You're not saying it didn't happen.  
22          You're just saying you don't recall?

23               MR. WAIDE: Object to the form. I  
24               think he testified that -- well, I don't  
25               think that's what he said. I object to

1 the form.

2 BY MR. DEAN:

3 Q. Mr. Williams, during your conversation  
4 with April Meggs about the person from Marshall  
5 County, did you ever give any advice about what  
6 to do with that person's employment status?

7 A. No. I just reminded her about the  
8 chain of command and the things, you know, as it  
9 relates to our confidentiality.

10 Q. And did you encourage her to terminate  
11 that person's employment?

12 A. No, sir. No, sir.

13 Q. Did you have any sort of input into  
14 that person's employment status?

15 A. No, sir. Like I said, that's a  
16 contract company. You know, who they hire and  
17 fire, you know, that's, you know, up to the  
18 contractor.

19 Q. And is April Meggs -- other than April  
20 Meggs, did you speak to anybody else at  
21 Centurion about Dr. Woods' employment status?

22 A. No, sir. No, sir.

23 MR. DEAN: Give me one second.

24 I think that's all we have. I think  
25 that's it from us.